



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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September 29, 2021

Hon. Andrew T. Baxter
United States Magistrate Judge
United States District Court
Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

Re: *Sparks, Yusuf v. Holland, Jason et. al*
Northern District of New York
19-CV-1269 (MAD)(ATB)

Dear Judge Baxter:

This office represents the Defendants, twelve current and former employees of the New York State Department of Corrections and Community Supervision, in the above-referenced matter. Please accept this letter as a status update regarding outstanding discovery issues in this matter.

By communication dated September 21, 2021, Plaintiff's counsel advised that they will not agree to the proposed standard Confidential/Attorney Eyes Only protective agreement and provided significant proposed edits. These edits have been submitted to DOCCS Counsel's Office for review. Today, the undersigned advised Plaintiff's counsel that we do not expect a response on the proposed edits until next week. Given that a protective agreement must be in place in order to produce some of the documents that Plaintiff's counsel is requesting, we respectfully request that the Court suspend the deadlines related to Plaintiff's motion until this issue can be resolved. The undersigned can provide the Court with a status report on October 20, 2021, if agreeable.

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Thank you for your kind consideration of this request.

Respectfully yours,

s/ Kasey K. Hildonen

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